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August 11, 2017

**VIA ECF AND ELECTRONIC MAIL**

Honorable Freda L. Wolfson  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

Honorable Lois H. Goodman  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**Re: JOHNSON & JOHNSON TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES AND PRODUCTS LIABILITY  
LITIGATION  
Case No. 3:16-MD-02738-FLW-LHG**

Dear Judge Wolfson and Judge Goodman:

As a follow-up to our August 9, 2017 letter regarding certain artifacts discovery issues, we learned that yesterday plaintiffs in a California state proceeding have filed an ex parte application for an order compelling Defendant Johnson & Johnson to produce the same artifacts that are the subject of our August 9, 2017 letter. The application will be heard today at 11:30 AM (ET). This is but one example of the Johnson & Johnson Defendants' concern that there will be a nationwide rush for first-come, first-served orders for production and destructive testing, and is further evidence of the need for this Court's intervention at this time.

We appreciate Your Honors' consideration of the foregoing, and we look forward to discussing these issues on our call at 12:00 AM (ET).

*Andrew B. Joseph  
Partner responsible for  
Florham Park Office*



**VIA ECF AND ELECTRONIC MAIL**

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Honorable Lois H. Goodman  
August 11, 2017  
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Respectfully,

*/s/ Susan M. Sharko*

Susan M. Sharko

*/s/ Julie Tersigni*

Julie Tersigni

cc: All Counsel of Record via ECF  
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